

# EXHIBIT 3

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

PAULA F. SOTO,

Plaintiff,

Civil Action No. 1:13-cv-10822-JGD

v.

CITY OF CAMBRIDGE,

Defendant.

**PLAINTIFF PAULA F. SOTO'S SECOND SET OF INTERROGATORIES TO  
DEFENDANT CITY OF CAMBRIDGE**

Pursuant to Federal Rules of Civil Procedure 26 and 33, and Local Rule 33.1, Plaintiff Paula F. Soto ("Soto") requests that Defendant City of Cambridge (the "City") answer the following interrogatory in writing under oath within thirty (30) days of service.

**INSTRUCTIONS**

1. The following instructions apply to the interrogatory below and should be considered part of each such interrogatory.
2. The City shall answer each interrogatory completely, and in the form required by Local Rule 33.1(a) and (c). Should the City withhold any requested information for any reason, the City is requested to state the basis for withholding the information in a manner sufficient to enable Soto and the Court to adjudicate the validity of the City's objection, and it shall answer the remainder of the interrogatory. If the City objects to any portion of the interrogatory on the grounds of privilege, work product, or other alleged protection against disclosure, it shall identify:
  - a) the information being withheld; and
  - b) the nature of the privilege that is being claimed.
3. The interrogatory is continuing in nature and requires supplemental or additional responses in accordance with Federal Rule of Civil Procedure 26(e).
4. If in answering this interrogatory you claim any ambiguity in either the interrogatory or an applicable definition or instruction, identify in your response the language you consider ambiguous and state the interpretation of the language you used to respond.

5. If you object to any portion of the interrogatory, respond fully to all of the portions to which your objection does not apply, as required by Local Rule 33.1(c).

### **DEFINITIONS**

1. The Uniform Definitions in Discovery Requests set forth in Rule 34(a) of the Federal Rules of Civil Procedure, and the Uniform Definitions in Discovery Requests set forth in Local Rule 26.5 are incorporated by reference.
2. The Definitions and Instructions set forth in Plaintiff's First Set of Requests for Production for the Production of Documents and Tangible Things to Defendant City of Cambridge are incorporated herein by reference.
3. The term "identify" has the meaning provided in Local Rule 26.5(3) and (4). The terms "specify," "state," or any variant of those terms mean "identify," as defined by Local Rule 26.5(3) and (4).
4. The terms "you" and "your" refer to the City, as well as its officers, directors, employees, partners, or affiliates.

### **INTERROGATORIES**

#### **INTERROGATORY NO. 14**

To the extent that the City's responses to RFA Nos. 24-32 are anything other than unqualified admissions, please state the basis for your responses.

Dated: October 6, 2015

Respectfully submitted,

/s/ Julia M. Ong

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*Attorneys for Plaintiff Paula F. Soto*

**CERTIFICATE OF SERVICE**

I, Julia Ong, hereby certify that a true copy of the above document was served by electronic mail on the following person:

Samuel Aylesworth (saylesworth@cambridgema.gov)

Dated: October 6, 2015

/s/ *Julia M. Ong*  
Julia M. Ong